

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
[www.flmd.uscourts.gov](http://www.flmd.uscourts.gov)

IN RE:

CASE NO.: 6:15-bk-01810-CCJ

CONEPCION SABORIDO,

Chapter 13

Debtor.

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**CERTIFICATION OF NECESSITY OF REQUEST FOR EMERGENCY HEARING**

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matter under consideration and to the best of my knowledge, information and Belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleading on an emergency basis:

**EMERGENCY MOTION TO REOPEN CHAPTER 13 CASE SOLELY FOR  
DETERMINATION OF STAY RELIEF AND RE-CLOSING CASE THEREAFTER**

I CERTIFY FURTHER that there is a true necessity for an emergency hearing, specifically, because Interested Party, Crystal Clear Holdings, LLC seeks a determination that no stay was in effect at the time of the foreclosure sale of a parcel of real property by the virtue of this case filing or granting stay relief *nunc pro tunc* to allow the sale to proceed and requires a hearing on an expedited basis for the following reason: the filing of this case has delayed the innocent third party purchaser from taking complete possession of the subject property and because the filing of this case has caused injury to the bona fide third party purchaser for value paid for the real property at the duly scheduled foreclosure sale.

I CERTIFY FURTHER that the necessity of this emergency hearing has not been caused by a lack of due diligence on my part, but has been brought about only by circumstances beyond my control or that of my client. I further certify that this motion is filed with full understanding of F.R.B.P. 9011 and the consequences of noncompliance with same.

DATED this 4<sup>th</sup> day of May, 2015.

Respectfully Submitted,

By: 

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